

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION**

This document relates to:

*The County of Summit, Ohio, et al. v. Purdue  
Pharma L.P., et al.*  
Case No. 18-op-45090

and

*The County of Cuyahoga v. Purdue Pharma  
L.P., et al.*  
Case No. 1:18-op-45004

**MDL No. 2804  
Case No. 17-md-2804  
Hon. Judge Dan A. Polster**

**MCKESSON CORPORATIONS OBJECTIONS TO  
PLAINTIFFS' DEPOSITION DESIGNATIONS**

Pursuant to the Civil Jury Trial Order, ECF No. 1598, entered in In re National Prescription Opiate Litigation (MDL 2804) on May 1, 2019 (as amended in Judge Polster's July 29, 2019 order), McKesson Corporation ("McKesson") submits the following Objections to Plaintiffs' Affirmative Deposition Designations and Plaintiffs' Counter Deposition Designations.

McKesson hereby serves Objections to the following deposition designations affirmatively designated by Plaintiffs (*see* Exhibit A):

1. Gary Boggs (January 17, 2019 deposition)
2. Eugene Cavacini
3. David Gustin
4. Nathan Hartle (July 31 and August 1, 2019 depositions)

5. Tracy Jonas
6. Michael Oriente
7. Blaine Snider

Because Plaintiffs have withdrawn all deposition designations to certain witnesses for whom they previously offered affirmative designations (David Graziano, Gary Hilliard, William de Gutierrez Mahoney, Thomas McDonald, and Donald Walker), McKesson is not filing objections to those affirmative designations. McKesson, however, reserves the right to object to any attempt by Plaintiffs to play affirmatively any portion of these witnesses' video depositions at trial and reserves the right to counter-designate testimony for these witnesses. McKesson files these objections based on Plaintiffs' current deposition designations as of October 2, recognizing that Plaintiffs continue to reduce their witness list and will file a further-reduced list on October 4. By filing objections today, McKesson does not concede the propriety of or waive any objection to any attempt by Plaintiffs to play deposition testimony from witnesses that do not appear on Plaintiffs' final witness list.

McKesson further hereby serves Objections to Plaintiffs' counter-designations made in response to Defendants' affirmative designations of the deposition transcript for Donald Walker (*see* Exhibit B).

McKesson reserves all rights, including all rights to revise or withdraw these Objections. McKesson further reserves the right to revise or withdraw these Objections based on the Court's rulings, Plaintiffs' and other individual Defendants' designations of deposition testimony, and evidence introduced at trial. Consistent with prior representations by Plaintiffs' counsel that "objections and colloquy will not be proffered" by Plaintiffs, McKesson has not

objected on a line-by-line basis to objections and colloquy; instead, McKesson objects to all objections and colloquy as a global matter.

McKesson's objections are made pursuant to the following Objections Key:

<b>Code</b>	<b>Objection</b>
402	Relevance. FRE 402.
403	Undue Prejudice, Confusion, Waste of Time. FRE 403.
408	Inadmissible Evidence of Settlement or Negotiations. FRE 408.
602	Lack of Foundation/Speculation. FRE 602.
802	Hearsay. FRE 802.
AA	Asked and Answered. FRE 611(a).
AF	Assumes Facts Not in Evidence. FRE 103(d), 611(a).
ARG	Argumentative. FRE 611(a).
AU	Authentication Lacking. FRE 901.
BER	Best Evidence Rule. FRE 1002.
CML	Cumulative. FRE 403, 611(a).
CMP	Compound Question. FRE 611(a).
CO	Contrary to Court Order.
COL	Improper Attorney Colloquy. FRE 103(d), 603.
DEM	Demonstrative Not Marked as Exhibit. FRE 103(d), 611(a).
HYP	Improper Hypothetical. FRE 602, 701.
ILO	Improper Opinion of Lay Witness. FRE 701.
INC	Designation Incomplete; Incomprehensible.
LC	Calls for Legal Conclusion. FRE 103(d), 602, 701.
LDG	Leading. FRE 611(c).
MD	Misstates the Document. FRE 103(d), 611(a).
MPT	Misstates Prior Testimony. FRE 103(d), 611(a).
NAR	Calls for Narrative Response. FRE 103(d), 611(a).
NR	Nonresponsive. FRE 611(a).
PV	Privileged. FRE 103(d), 501, 502.
SCP	Outside the Scope of Designated Topics. FRE 602, 611(a)-(b); FRCP 30(b)(6).
SUM	Improper Summary. FRE 1006.

Dated: October 2, 2019

Respectfully Submitted,

/s/ Geoffrey Hobart

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**CERTIFICATE OF SERVICE**

I, Geoffrey E. Hobart, hereby certify that the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ Geoffrey E. Hobart  
Geoffrey E. Hobart